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BY ECF

Honorable P. Kevin Castel United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007 Application Granted to the extent of 100 hours with leave to make further application at a later juncture on a more detailed explanation.

SO ORDERED.

Dated: 8/13/2020

P. Kevin Castel

United States District Judge

Re: <u>United States v. Terry Former, et al.</u> 19 CR 781 (PKC)

Dear Judge Castel:

On December 13, 2019, I was appointed as CJA counsel for Terry Former in the above-referenced matter. As the Court is aware, the indictment in this case charges the defendant with conspiracy to commit wire fraud and money laundering. Because defense counsel has been informed that discovery in this matter is substantial, we write to request the appointment of associate counsel in this matter at the reduced rate of \$110 per hour. Such appointment is necessary for the effective representation of this indigent defendant and is consistent with the statutory and authority for the provision of ancillary services in an appointed case.

Further, the appointment of associate counsel at a reduced rate will result in an overall reduction in the amount of funds the government will expend for Mr. Former's representation. My associate, Nadjia Limani, has served as associate counsel in the Southern District of New York in appointed matters where the allegations involved similar charges and the discovery was in both electronic and document form. Ms. Limani's role will be to review and summarize discovery material, review materials with the client and assist with trial preparation.

For the foregoing reasons, I respectfully request that Your Honor authorize Ms. Limani's assistance in the representation of Mr. Simon in the amount of 200 hours at \$110 per hour.

Respectfully Submitted,

/s/ Louis M. Freeman

Louis M Freeman